


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-md-03047-YGR

MDL No. 3047

This Document Relates to:

SAN MATEO COUNTY BOARD OF
EDUCATION, and NANCY MAGEE, in her
official capacity as San Mateo County
Superintendent of Schools v. YOUTUBE, LLC et.
al. 

**LOCAL GOVERNMENT AND SCHOOL
DISTRICT MASTER SHORT-FORM
COMPLAINT AND DEMAND FOR JURY
TRIAL**

Member Case No.:

3:23-cv-01108

The Plaintiff(s) named below file(s) this *Short-Form Complaint and Demand for Jury Trial* against the Defendant(s) named below by and through their undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations, claims, and relief sought in *Plaintiffs' Master Local Government and School District Complaint* ("Master Complaint") as it relates to the named Defendant(s) (checked-off below), filed in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047, in the United States District Court for the Northern District of California. Plaintiff(s) file(s) this *Short-Form Complaint* as permitted by Case Management Order No 8.

Plaintiff(s) indicate(s) by checking the relevant boxes below the Parties and Causes of Actions specific to Plaintiff(s)' case.

Plaintiff(s), by and through their undersigned counsel, allege(s) as follows:

I. DESIGNATED FORUM

1. *For Direct Filed Cases:* Identify the Federal District Court in which the Plaintiff(s) would have filed in the absence of direct filing:

2. *For Transferred Cases:* Identify the Federal District Court in which the Plaintiff(s) originally filed and the date of filing:

U.S. District Court, Northern District of California; Filed 03/13/2023

II. IDENTIFICATION OF PARTIES

A. PLAINTIFF(S)

3. *Plaintiff(s):* Name(s) of the local government or school district alleging claims against Defendant(s):

San Mateo County Board of Education

4. Number of schools served in the Plaintiff(s)' school district or local community:

174 Public Schools, 14 Charter, 188 Private Schools and 23 School Districts

5. Number of minors served in the Plaintiff(s)' school district or local community:

Approximately 101,836 students total

6. At the time of the filing of this *Short-Form Complaint*, Plaintiff(s) is/are a resident and citizen of [*Indicate State*]:

California

B. DEFENDANT(S)

7. Plaintiff(s) name(s) the following Defendant(s) in this action [*Check all that apply*]:

META ENTITIES

- ☒ META PLATFORMS, INC.,
formerly known as Facebook, Inc.
- ☒ INSTAGRAM, LLC
- ☒ FACEBOOK PAYMENTS, INC.
- ☒ SICULUS, INC.
- ☒ FACEBOOK OPERATIONS, LLC
- ☒ FACEBOOK HOLDINGS, LLC
- ☒ META PAYMENTS INC.

TIKTOK ENTITIES

- ☒ BYTEDANCE LTD
- ☒ BYTEDANCE INC.
- ☒ TIKTOK LTD
- ☒ TIKTOK LLC
- ☒ TIKTOK INC.

SNAP ENTITY

- ☒ SNAP, INC.

GOOGLE ENTITIES

- ☒ GOOGLE, LLC
- ☒ YOUTUBE, LLC

OTHER DEFENDANTS

For each “Other Defendant” Plaintiff(s) contends are additional parties and are liable or responsible for Plaintiff(s)’ damages alleged herein, Plaintiff(s) must identify by name each Defendant and its citizenship, and Plaintiff(s) must plead the specific facts supporting any claim against each “Other Defendant” in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

NAME	CITIZENSHIP

III. CAUSES OF ACTION ASSERTED

8. The following Causes of Action asserted in the *Master Complaint*, and the allegations with regard thereto, are adopted in this *Short-Form Complaint* by reference (*check all that are adopted*):

Asserted Against ¹	Count Number	Cause of Action (COA)
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input checked="" type="checkbox"/> Other Defendant(s) ²	1	NEGLIGENCE
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input checked="" type="checkbox"/> Other Defendant(s)	2	PUBLIC NUISANCE

NOTE

If Plaintiff(s) want(s) to allege additional Cause(s) of Action other than those selected in paragraph 8, which are the Causes(s) of Action set forth in the *Master Complaint*, the facts supporting those additional Cause(s) of Action, must be pled in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

IV. ADDITIONAL CAUSES OF ACTION

9. Plaintiff(s) assert(s) the following additional Causes of Action and supporting allegations against the following Defendants:

RICO (18 U.S.C. § 1961, et seq.), Conspiracy (18 U.S.C. § 1962), Gross Negligence (California Common Law) and Unfair Competition (Cal. Bus. & Prof Code § 17200, et seq.)

¹ For purposes of this paragraph, “entity” means those Defendants identified in Paragraph 7 (*e.g.*, “TikTok entities” means all TikTok Defendants against which Plaintiff(s) is/are asserting claims).

² Reference selected “Other Defendants” by the corresponding row number in the “Other Defendant(s)” chart identified in Paragraph 7.

1 **WHEREFORE**, Plaintiff(s) pray(s) for relief and judgment against Defendants and all
 2 such further relief that this Court deems equitable and just as set forth in the *Master Complaint*,
 3 and any additional relief to which Plaintiff(s) may be entitled.

4
 5 **JURY DEMAND**

6 Plaintiff(s) hereby demand a trial by jury as to all claims in this action.

7 ****

8 By signature below, Plaintiff(s)' counsel hereby confirms their submission to the authority
 9 and jurisdiction of the United States District Court of the Northern District of California and
 10 oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as
 11 necessary through sanctions and/or revocation of *pro hac vice* status.

12 /s/ Anne Marie Murphy

13 Name: Anne Marie Murphy

14 Firm: Cotchett, Pitre & McCarthy LLP

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19
 20 *Attorneys for Plaintiff(s)*

21 SAN MATEO COUNTY BOARD OF EDUCATION, and NANCY
 22 MAGEE, in her official capacity as San Mateo County
 23 Superintendent of Schools
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